



April 30, 2025

VIA E-MAIL AND FEDEX

Shawn R. Perez
Law Offices of Shawn R. Perez
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Ariel Mitchell
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Re: Ashley Parham, et al. v. Sean Combs, et al.
USDC Case No. 3:24-cv-07191-RFL

Counsel:

This office and the Davillier Law Group are counsel for Odell Beckham, Jr., whom your office named as a defendant in your clients' March 7, 2025 Amended Complaint (the "**Complaint**") in the above referenced action (the "**Action**"). The Complaint, which Ms. Mitchell has wildly publicized (notwithstanding your offices continued failure to even have a summons issued), makes horrific false allegations against Mr. Beckham and was filed in an attempt to destroy the reputation of our client. Setting aside that the Complaint recites a wildly implausible and internally inconsistent narrative, reminiscent of a sensationalized b-movie script, your clients have put forth allegations against Mr. Beckham that both she and you know to be false. Further, as detailed below and in the accompanying Declarations, Mr. Beckham was hundreds of miles away from Orinda, California at the time of the alleged assault.

Your client has repeatedly, both to the police and in Court filings made under oath, described the alleged assault as being done by two white men, Sean Pearce and an individual who your client described as being almost "his twin". In her contemporaneous statements to the police, her e-mails to Mr. Pearce over the ensuing months, and in a declaration signed under penalty of perjury, she makes *no* mention whatsoever of the bizarre allegations in the Complaint against my client (or, for that matter, any defendant other than Mr. Pearce). Absent from these contemporaneous recitations of the alleged assault are any mention of: (1) Mr. Beckham; (2) Mr. Desbordes; (3) Mr. Combs; (4) Mr. Pelletier; (5) the DOE Plaintiffs; (6) Ms. Wright; (7) Ms. Harris Scott; (8) Ms. Gonzalez; (9) Ms. Cunningham; (10) Ms. Combs; or (11) Mr. Lucks. Nor, for that matter, is there any discussion of the alleged incident with the knife, the supposed gunfight, the failed IUD insertion, or assault with a remote control, let alone the alleged anal or gang rapes.

Specifically, I note that the Complaint alleges at Paragraph 151 that Ms. Parham "filed a report to the Orinda Police Department on April 17, 2018, but was too afraid to name Defendant Diddy as one of her assailants." While it is clear that you had a copy of that police report prior to

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the filing of the Complaint (as you reference her providing clothing to the police from the night of the alleged assault), the Complaint fails to detail what your client *actually* reported to the Police.

Contrary to the click-bait allegations of the Complaint, your client reported to the police that:

On 3-23-2018 at 0300 hours, Pearce Called Parham and asked her to come over to his house because he was not feeling well due to cancer treatments. Parham was asleep and stated she took a sleeping pill before going to bed that night. Parham said she was surprised that she woke up when Pearce called her. Parham drove to Pearce's house. Pearce drove Parham up to Grizzly Peak Road to enjoy the view. About an hour later both Pearce and Parham went back to his house. Both Pearce and Parham ate edible marijuana. Parham stated she became extremely intoxicated between the sleeping pills and the marijuana. Pearce began to kiss Parham. Parham slated she was not expecting to have sex with Pearce because he said he was not feeling well.

Parham stated she was extremely intoxicated, sleepy, and could not move. Pearce then placed multiple fingers inside of Parham's vagina causing pain. Pearce then inserted his penis inside of her vagina and began to have sexual 'intercourse with her. Pearce then flipped Parham on to her stomach, and she was not face down. Parham then stated another man began to have sex with her while she was face down. Later she was able to see that the other man was Pearce's friend "The twin." Pearce and his friend took turns having sex with Parham. Parham stated she could not fight because she was intoxicated. Parham stated Pearce and "The twin" took turns having sexual intercourse with her for approximately 30 minutes. Parham was unsure if Pearce ejaculated inside her vagina. "The twin" was the last suspect to have sexual intercourse with her and Parham believes he did ejaculate inside of her vagina. Parham stated the two men did not touch her at the same time or commit any sexual acts at the same time with her.

After "The twin" finished he rolled over and laid next to Parham for a few minutes. Parham was unsure where Pearce was when "The twin" was laying next to her. Parham felt "The twin" get off the bed and he left. Pearce then laid down next to Parham on the bed. Parham fell asleep on Pearce's bed. She woke up later in the morning and went to Geppello's Caffè located on Orinda Way and got

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breakfast for Pearce and herself. She then returned to Pearce's house and had breakfast with him. Parham then left after breakfast.

Parham did not speak to Pearce for a few days. On 3-26-2018 Parham went to Harborside marijuana dispensary located at 1840 Embarcadero in Oakland. When Parham was there, she saw "The twin" who was working as security at the dispensary. Parham did not speak to "the twin." but she did make eye contact with him. At 1645 hours, Parham sent Pearce a text message saying that she saw his twin at Harborside. Pearce did not respond to her text message, Parham described Pearce's friend ("The Twin") as a white male adult approximately 35 to 40 years old, 6 feet tall with a thin build. Brown hair with brown eyes and a short beard. Parham could not provide any further description of the other suspect other than he looks like Pearce.

Parham and Pearce sent a few text messages back and forth then on 4-7-2018 at 1608 hours, Parham sent Pearce a text message "WHY DID YOU RAPE ME WITH YOUR FRIEND!" Pearce responded back with "Excuse me?!!!" I took photographs of the text message conversation, sec attached. Pearce did not admit to any of the allegations that he raped Parham.

A copy of the police report is attached hereto as Exhibit A.

Glaringly absent from your client's report to the police is *any* mention of involvement by anyone *other than* Mr. Pearce and his "twin" – i.e., two white men. None of the wild allegations that you and your clients included in the Complaint about the events of that night or *any* of the other named defendants, including Mr. Beckham, or the DOE Plaintiffs¹, can be found in her discussion of the events of that night with the police. Further, the Walnut Creek police department has confirmed that no police report exists naming Mr. Beckham.

Ms. Pearce was consistent in her story that she was assaulted at about 4 or 5 a.m. on the morning of March 23, 2018 by two white men in subsequent correspondence with Mr. Pearce. In opposition to an Application for A Restraining Order that Mr. Pearce filed *against* your client in July 2019, your client submitted a declaration, signed under penalty of perjury. There, she again recites that Mr. Pearce and his friend, the "twin", assaulted her at approximately 4 am on the

¹ I note that despite the Court Order of March 14, 2025, you have yet to file a Motion seeking permission for two of your clients to proceed as "DOE" Plaintiffs. I can only assume that it is because they, like the allegations against my client, are pure fiction.

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morning of March 23, 2018. She attached to her Declaration, a copy of which is attached as Exhibit B, the aforementioned police report, as well as:

- A. An email dated August 23, 2018 to Mr. Pearce, accusing him of raping her with his friend (never mentioning anyone else's involvement, or the sensationalist claims in the Complaint); and
- B. An email dated September 6, 2018 to Mr. Pearce, again accusing Mr. Pearce and his "twin" of assaulting her at 4 a.m. on the morning of March 23, 2018, and again noting that she was assaulted by "two white men" (and not detailing any of the sensationalist claims in the Complaint).

As the Court Records surrounding Mr. Pearce's application for a Restraining Order² are public, you no doubt were already in possession of these contemporaneous recitations of the alleged March 23, 2018 assault – recitations which are dramatically different, to say the least, than those in the Complaint. While we take no position as to her allegations as to Mr. Pearce and "his twin", for you to have put forth such wild and demonstrably false allegations against Mr. Beckham subjects you to not only Rule 11 Sanctions, but an action for malicious prosecution.

There simply is no way that you could have any reasonable belief in the truth of the allegations in the Complaint in the face of such contemporaneous conflicting statements, made under oath, by your client. An attorney cannot blindly accept statements that are implausible or hearsay without attempting corroboration. *Hendrix v. Naphtal* (9th Cir. 1992) 971 F2d 398, 400. For example, counsel is expected to take the time to examine relevant records and the prior history of his or her client case before filing suit. *Mercury Air Group, Inc. v. Mansour* (5th Cir. 2001) 237 F3d 542, 548. Either you were grossly negligent in failing to investigate your clients' wild accusations *or* you knowingly put forth false allegations. Of course, under either scenario, you are exposed to substantial liability.

Based on Ms. Mitchell's media tour, we have no doubt that she will attempt to evade liability by claiming that Ms. Pearson was suffering from "repressed memories". While the multitude of contemporaneous recitations by your client belie any such assertion, Ms. Mitchell's multiple media-hits since October 2024 make clear that you have done nothing to generate *any* evidentiary support for her claims against Mr. Beckham.

While that alone subjects you to liability, we note that even if the two of you only acted with willful blindness and gross negligence towards my client, rather than with outright malicious intent, the continued prosecution of this claim further subjects both you and your clients to liability. Irrefutable evidence establishes that Mr. Beckham was in Los Angeles at the time of the alleged

² Which include text messages from your client to Mr. Pearce from May 2019, harassing Mr. Pearce and stating that she had recently miscarried after being impregnated by him during consensual sex.

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assault, hundreds of miles away from the site of the alleged assault. *See, Zamos v. Stroud* (2004) 32 Cal 4th 958, 969 (“an attorney [and his/her client] may be held liable for malicious prosecution for continuing to prosecute a lawsuit discovered to lack probable cause.”)

Attached hereto as Exhibit C is the declaration of Grigor Vahanyan. Mr. Vahanyan operates a car service in Los Angeles, California and, as you will see in the attached, he has contemporaneous notes from March 20, 2018 through March 24, 2018, when he was hired to drive Mr. Beckham in Los Angeles. Mr. Vahanyan has provided contemporaneous time records showing that he was with Mr. Beckham and his colleague, Ajay Sangha (whose declaration is also attached as Exhibit D) on March 22, 23 and 24, 2018 in Los Angeles.

You will note that Mr. Vahanyan, Mr. Sangha, and Mr. Beckham (whose declaration is Exhibit E) discuss how Mr. Beckham was at his home on Solar Drive in Los Angeles at 6:00 p.m., and did not leave until the following day at 2:30 p.m.

Also included, as Exhibit F, is the Declaration of Jeremy Hill. As attested to by Messrs. Hill, Sangha, and Beckham, the three of them were at the Solar Drive home, approximately 365 miles away from the location of the alleged assault, well into the early morning of March 23, 2018. Attached to Mr. Beckham’s Declaration is a video which he personally recorded at 10:02 p.m. on March 22, 2018 of Messrs. Hill and Sangha playing video games where he can be heard talking to Mr. Hill. Also attached is a screen shot taken from that video, along with the metadata.

Also included with Mr. Beckham’s declaration are contemporaneous text messages from March 22, 2018 with Cliff King of Nike, Inc. In those text messages that discuss meeting at 1:00 p.m. on March 23, 2018 at Mr. Beckham’s home in Los Angeles. Additionally, Mr. Beckham confirms his plans to stay in that evening because he was tired from his workout earlier in the afternoon. The Declarations of Messrs. Beckham, Sangha, and Vahanyan, along with the contemporaneous business records and videos, all confirm that Mr. Beckham was at his home in Los Angeles from approximately 6:00 p.m. on March 22, 2018 until approximately 2:30 p.m. on March 23, 2018.

The Declarations also provide evidence of Mr. Beckham’s whereabouts on March 23 and 24, 2018 to the extent that your client seeks to change not only the alleged participants and details of her alleged assault, but date of the claimed crime.

Put simply, you and your clients have put forth allegations against Mr. Beckham that are not only contrary to her repeated contemporaneous allegations of assault by Mr. Pearce, but have alleged his participation in a horrific crime at a date and time when he was demonstrably hundreds of miles away from the alleged location. You have put forth these scurrilous allegations despite documentary evidence that was already in your possession and in the public record that entirely exculpate Mr. Beckham, without any additional inquiry or investigation, and done so for transparently malicious purposes.

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To be clear, while Mr. Beckham will not waive any of his rights or remedies against you or your clients, if you are to mitigate your exposure, we demand that you immediately dismiss Mr. Beckham from the Action, with prejudice. Further, we demand that you immediately release a public statement that states:

1. Mr. Beckham has been dismissed from the action, with prejudice;
2. Mr. Beckham was not in Orinda, California the night of alleged assault, and in fact has never met or interacted in any form with Ms. Parham;
3. You and your clients apologize to Mr. Beckham for naming him in the Complaint, and fully and unconditionally retract any and all allegations made against him; and
4. The false accusations made against him by you and your clients have been detrimental to Mr. Beckham, and that you understand and acknowledge that he remains free to pursue claims against each of you should he so desire.

Failure to immediately dismiss the action and release the foregoing statement will be used as evidence of malice against you and your client should Mr. Beckham be forced to seek Rule 11 Sanctions and/or pursue a claim for malicious prosecution.

Finally, I cannot overstate the fact that your actions have greatly harmed not just Mr. Beckham. Making wild, unsubstantiated and demonstrably false allegations harms not just the wrongfully accused, but it dissuades actual victims of sexual abuse from coming forward. You have harmed untold numbers of women with your reckless, if not malicious conduct. You should be ashamed of yourselves, not just as lawyers and officers of the court, but as human beings.

The foregoing is not intended to be, nor should it be construed as, a full and complete recitation of all relevant facts or law, or as a waiver of any of our client's rights, remedies, or positions, all of which are expressly reserved.

Sincerely,



Andrew V. Jablon

Encl.

CC: Daniel Davillier (via e-mail only)

Exhibit “A”



DR No: 180004968

Sup No: ORIG

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OFFICE OF THE SHERIFF, CONTRA COSTA COUNTY

CA0070000

P.O. BOX 391, Martinez, California 94553-0039

Beat: 81

DV: No

ARREST: No

APPROVED BY: METH, MICHAEL

DR No. 180004968	Sup. No ORIG	Assignment ORI	Reported Date Tue 04/17/2018	Reported Time 1414	Status Prosecution Desired	Confidential? Yes	Empl. No./ID 77154
From Date Fri 03/23/2018	From Time 0300	To Date Fri 03/23/2018	To Time 0600	Report Incident Type 261	Use Of Force None		
Location 17 LOMA VISTA DR					City ORI	Zip 94563	
Offense No. 1	Offense PC261	Offense Description Rape (F)					
Evidence Yes	Fingerprint	Body Camera	Marsy's Law Yes	Elder Abuse From SOC 341	Victim Response - 293 PC	Missing/Stolen Value	Damaged Value

SYNOPSIS

This report concerns Suspect-Shane Pearce and an unknown suspect having non consensual sexual intercourse with Vic-Ashley Parham at Pearce's residence at 17 Loma Vista Drive in Orinda.

Parham desires prosecution in the case

At the time of this report Pearce has not provided a statement. The other suspect in the case has not been identified.

SUBJECTS

Person Reporting and Victim	Invl. No 1	Type Individual	Name PARHAM, ASHLEY NICOLE							
	Race	Gender	DOB	AGE	To Age	Height	To Height	Weight	To Weight	Juvenile? No
	Hair Color	Eye Color	Skin	General Appearance		Builld	Clothing Discription			
	Hair Description	Facial Features			Speech	Demeanor		Deformity		
	Further Description									
	Address Type Home	Location 1610 BELLFLOWER PL.				City WALNUT CREEK	State CA	Zip 94596		
	ID Type Operator License	ID No. 89529806		Operator License State California						
	Offense Link Victim	Offense PC261		Phone Type Cell		Phone Number (925) 639-7855				
	Email Type	Email								
	Mark Type	Mark Code		Mark Description						
	Employer / School				Position / Grade		Empl. From Date		Empl. To Date	
	Empl. Location				Empl. City		Empl. State		Empl. Zip	
	Empl. Contact				Empl. Phone Type		Empl. Phone			

Distribution
ORINDA PD,

CONTRA COSTA COUNTY
OFFICE of the SHERIFF

Additional Routing

Reporting Deputy (Print) Ladner, Joseph	Date / Time Written 4/25/2018 08:21:02	Disposition Referred
Approving Supervisor(Print) METH, MICHAEL	Supervisor No. 66250	Date 4/26/2018



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OFFICE OF THE SHERIFF, CONTRA COSTA COUNTY

Beat: 81

CA0070000

DV: No

P.O. BOX 391, Martinez, California 94553-0039

ARREST: No

Suspect	Invl. No 1	Type Individual	Name PEARCE, SHANE PAUL										
	Race White	Gender Male	DOB	AGE 40	To Age	Height 601	To Height	Weight 190	To Weight	Juvenile? No			
	Hair Color Brown	Eye Color Brown	Skin	General Appearance	Build	Clothing Description							
	Hair Description	Facial Features	Speech	Demeanor	Deformity								
	Further Description												
	Address Type Home	Location 17 LOMA VISTA DR	City ORINDA	State CA	Zip 94563								
	ID Type Operator License	ID No.	Operator License State										
	Offense Link Suspect	Offense PC261	Phone Type Cell	Phone Number									
	Email Type	Email											
	Mark Type	Mark Code	Mark Description										
	Employer / School	Position / Grade				Empl. From Date	Empl. To Date						
	Empl. Location	Empl. City				Empl. State	Empl. Zip						
	Empl. Contact	Empl. Phone Type				Empl. Phone							
	Suspect	Invl. No 1	Type Individual	Name UNKNOWN, UNKNOWN									
		Race White	Gender Male	DOB	AGE 35	To Age 40	Height 600	To Height 601	Weight 180	To Weight 200	Juvenile? No		
Hair Color Brown		Eye Color Brown	Skin	General Appearance	Build	Clothing Description							
Hair Description Short Hair		Facial Features Full Beard	Speech	Demeanor	Deformity								
Further Description Unknown suspect, Pearce's friend													
Address Type		Location	City	State	Zip								
ID Type		ID No.	Operator License State										
Offense Link Suspect		Offense PC261	Phone Type	Phone Number									
Email Type		Email											
Mark Type		Mark Code	Mark Description										
Employer / School		Position / Grade				Empl. From Date	Empl. To Date						
Empl. Location		Empl. City				Empl. State	Empl. Zip						
Empl. Contact		Empl. Phone Type				Empl. Phone							
VEHICLES													
Distribution ORINDA PD,													
Additional Routing													
Reporting Deputy (Print) Ladner, Joseph					Date / Time Written 4/25/2018 08:21:02		Disposition Referred						
Approving Supervisor (Print) METH, MICHAEL					Supervisor No. 66250		Date 4/26/2018						



DR No: 180004968

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OFFICE OF THE SHERIFF, CONTRA COSTA COUNTY

CA0070000

P.O. BOX 391, Martinez, California 94553-0039

Beat: 81

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VESSELS							
PROPERTY							
Evidence	Inv. Date	Article			Serial No.	In Custody?	# Pieces
	04/17/2018	Clothing				No	2
	Value	Owner Applied Number	Description				
			Underwear and bra for DNA testing				
	Tag Number	Item Number	Disposition	Disposition Date	Storage Area		
Link	Involvement		Name			DOB	
	Person Reporting and Victim		PARHAM, ASHLEY NICOLE				
MODUS OPERANDI							
NARRATIVE							
<p>On 4-17-2018 at 1414 hours, I was dispatched to a report of a rape that occurred on 3-23-2018 at 17 Loma Vista Drive in Orinda. Vic-Ashley Parham reported Sus-Shane Pearce and an unknown suspect had sexual intercourse with her at Pearce's residence. Parham reported she saved the underwear she wore that day.</p> <p>I contacted Parham by telephone at her request. I asked Parham to come to the Orinda Police Department to report the incident to me in person. Parham agreed and arrived at the Orinda Police Department. Parham, identified by her California driver's license provided me with the following statement in summary:</p> <p>Parham met Pearce at Dan's Irish Sports Bar located at 1524 Civic Drive in Walnut Creek on 2-3-2018. Pearce was at the bar celebrating his 40th birthday with his friends. Parham and Pearce began to talk and flirt with each other at the bar. Parham and Pearce kissed each other at the bar. Parham and Pearce continued to talk and drink alcohol. Parham stated she got shy and looked down. She felt a hand move her face up and she kissed Pearce again. Parham opened her eyes and noticed that she did not kiss Pearce, but she kissed his friend who looks like Pearce. Parham did not know Pearce's friend's name, but she called him Pearce's twin due to their similar looks.</p> <p>Later that night Parham and Pearce along with Pearce's friends went to Mr. Lucky's bar located at 1527 Lucust Street in Walnut Creek. Parham reported that she was raped in the bathroom at Mr. Lucky's by an unknown suspect. Parham believes the suspect is a friend of Pearce's, but she could not remember much because she was heavily intoxicated. Parham report the incident to Walnut Creek Police Department (WCPD report number 18-7665)</p> <p>Parham stated she has been a victim of sexual assault many times and started when she was very young. Parham said she has post-traumatic stress disorder (PTSD) from previous sexual assaults.</p> <p>Parham and Pearce continued to talk and text message each other after that night. Parham stated Pearce was fighting cancer and they both enjoyed talking with each other about their respective issues with Parham's PTSD and Pearce fighting cancer. On 2-18-2018 Parham and Pearce hung out together at his house in Orinda. Parham stated they did not have sexual intercourse that night but did kiss. Parham described Pearce at this point in their relationship at a "Perfect Gentleman."</p> <p>On 3-11-2018 Parham and Pearce had consensual sexual intercourse at Pearce's friend's house in Walnut Creek.</p> <p>On 3-13-2018 Parham received a video call from Pearce and his friend the "twin". Pearce asked Parham to come over</p>							
Distribution							
ORINDA PD,							
Additional Routing							
Reporting Deputy (Print)				Date / Time Written		Disposition	
Ladner, Joseph				4/25/2018 08:21:02		JUL 24 2018 Referred	
Approving Supervisor (Print)				Supervisor No.		Date	
METH, MICHAEL				66250		4/26/2018	



DR No: 180004968

Sup No: ORIG

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OFFICE OF THE SHERIFF, CONTRA COSTA COUNTY

CA0070000

P.O. BOX 391, Martinez, California 94553-0039

Beat: 81

DV: No

ARREST: No

to have sex with him and his friend. Parham declined and did not come over to Pearce's house.

On 3-23-2018 at 0300 hours, Pearce Called Parham and asked her to come over to his house because he was not feeling well due to cancer treatments. Parham was asleep and stated she took a sleeping pill before going to bed that night. Parham said she was surprised that she woke up when Pearce called her. Parham drove to Pearce's house. Pearce drove Parham up to Grizzly Peak Road to enjoy the view. About an hour later both Pearce and Parham went back to his house. Both Pearce and Parham ate edible marijuana. Parham stated she became extremely intoxicated between the sleeping pills and the marijuana. Pearce began to kiss Parham. Parham stated she was not expecting to have sex with Pearce because he said he was not feeling well.

Parham stated she was extremely intoxicated, sleepy, and could not move. Pearce then placed multiple fingers inside of Parham's vagina causing pain. Pearce then inserted his penis inside of her vagina and began to have sexual intercourse with her. Pearce then flipped Parham on to her stomach, and she was not face down. Parham then stated another man began to have sex with her while she was face down. Later she was able to see that the other man was Pearce's friend "The twin." Pearce and his friend took turns having sex with Parham. Parham stated she could not fight because she was intoxicated. Parham stated Pearce and "The twin" took turns have sexual intercourse with her for approximately 30 minutes. Parham was unsure if Pearce ejaculated inside her vagina. "The twin" was the last suspect to have sexual intercourse with her and Parham believes he did ejaculate inside of her vagina. Parham stated the two men did not touch her at the same time or commit any sexual acts at the same time with her.

After "The twin" finished he rolled over and laid next to Parham for a few minutes. Parham was unsure where Pearce was when "The twin" was laying next to her. Parham felt "The twin" get off the bed and he left. Pearce then laid down next to Parham on the bed. Parham fell asleep on Pearce's bed. She woke up later in the morning and went to Geppetto's Caffe located on Orinda Way and got breakfast for Pearce and herself. She then returned to Pearce's house and had breakfast with him. Parham then left after breakfast.

Parham did not speak to Pearce for a few days. On 3-26-2018 Parham went to Harborside marijuana dispensary located at 1840 Embarcadero in Oakland. When Parham was there, she saw "The twin" who was working as security at the dispensary. Parham did not speak to "the twin," but she did make eye contact with him. At 1645 hours, Parham sent Pearce a text message saying that she saw his twin at Harborside. Pearce did not respond to her text message.

Parham described Pearce's friend ("The Twin") as a white male adult approximately 35 to 40 years old, 6 feet tall with a thin build. Brown hair with brown eyes and a short beard. Parham could not provide any further description of the other suspect other than he looks like Pearce.

Parham and Pearce sent a few text messages back and forth then on 4-7-2018 at 1608 hours, Parham sent Pearce a text message "WHY DID YOU RAPE ME WITH YOUR FRIEND?" Pearce responded back with "Excuse me?!!!" I took photographs of the text message conversation, see attached. Pearce did not admit to any of the allegations that he raped Parham

I asked Parham why she did not yell or scream to stop. Parham stated she was frozen and was unable to be verbal due to her level of intoxication. Parham stated that she has been sexually assaulted many times in the past and when Pearce and his friend began to have sex with her she "shut down."

Parham said she saved the underwear and bra that she was wearing that day. Parham provided me with the underwear

Distribution ORINDA PD,		CONTRA COSTA COUNTY SHERIFF'S OFFICE	
Additional Routing			
Reporting Deputy (Print) Ladner, Joseph	Date / Time Written 4/25/2018 08:21:02	Disposition Referred	
Approving Supervisor(Print) METH, MICHAEL	Supervisor No. 66250	Date 4/26/2018	



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OFFICE OF THE SHERIFF, CONTRA COSTA COUNTY

Beat: 81

CA0070000

DV: No

P.O. BOX 391, Martinez, California 94553-0039

ARREST: No

which I booked into Orinda Evidence.

I attempted to call Pearce on 4-17-2018 at 1639 hours. I left a voicemail for Pearce to call me. On 4-18-2018 at 1336 Pearce called the Orinda Police Department. Officer Brooks advised Pearce of my work schedule and to call back when I returned to work.

On 4-22-2018 at 1518 hours I called Pearce again and left a voicemail to call me. At 1612 hours I went to 17 Loma Vista Drive to contact Pearce. Pearce was not home; I left my card on the front door with a note to contact me.

On 4-23-2018 at 0830 hours I called Pearce and left a voicemail for him to call me. I went to his house at 0838 hours, and no one was home.

On 4-24-2018 at 0930 hours I called Pearce and left a voicemail for him to call me.

On 4-24-2018 at 1044 hours I faxed a request for a copy of the Walnut Creek Police report (18-7665). At the time of this report I have not received a copy of the police report from Walnut Creek Police Department.

At the time of this report, I have not been able to contacted Pearce for a statement. I also have not been able to identify Pearce's friend.

Distribution
ORINDA PD,

Additional Routing

Reporting Deputy (Print)
Ladner, Joseph

Date / Time Written
4/25/2018 08:21:02

Disposition
Referred

Approving Supervisor(Print)
METH, MICHAEL

Supervisor No.
66250

Date
4/26/2018

Exhibit “B”

7/9
018
DV-120**Response to Request for Domestic Violence Restraining Order****1 Name of Person Asking for Protection:**

(See form DV-100, item (1).)

SHANE PAUL PEARCE**2 Your Name:****ASHLEY NICOLE PARHAM**

Your lawyer in this case (if you have one):

Name: **SHARON K. RAAB** State Bar No.: **169343**Firm Name: **LAW OFFICE OF SHARON K. RAAB**

Address (If you have a lawyer for this case, give your lawyer's information. If you do not have a lawyer and want to keep your home address private, give a different mailing address instead. You do not have to give your telephone, fax, or e-mail.):

Address: **18 Crow Canyon Court, Suite 200**City: **San Ramon**, State: **CA** Zip: **94583**Telephone: **(925) 820-3833** Fax: **(925) 820-5533**E-Mail Address: **lawlady118@gmail.com****3 Use this form to respond to the Request for Domestic Violence Restraining Order (form DV-100).**

- Fill out this form and take it to the court clerk.
- Have the person in (1) served by mail with a copy of this form and any attached pages. (See form DV-250, *Proof of Service by Mail*.)
- For more information, read form DV-120-INFO, *How Can I Respond to a Request for Domestic Violence Restraining Order?*
- This form is for a response to a restraining order request. For more information about how to request your own restraining order, read form DV-505-INFO and form DV-120-INFO (see the section called "What if I need a restraining order against the other person?")

The judge will consider your Response at the hearing.Write your hearing date, time, and place from form DV-109, *Notice of Court Hearing*, item (3), here:**Hearing Date**Date: **July 9, 2019**Time: **8:30 a.m.**Dept.: **18**

Room:

You must obey the orders in Form DV-110, *Temporary Restraining Order*, until the hearing. At the hearing, the court may make restraining orders against you that could last up to five years and could be renewed.**4 Relationship to Person Asking for Protection**

- a. ☒ I agree to the relationship listed in item (4) on form DV-100.
- b. ☐ I do not agree that the other party and I have or had the relationship listed in item (4) on form DV-100 because: _____

5 Other Protected People

- a. ☐ I agree to the order requested.
- b. ☒ I do not agree to the order requested, ☒ but I would agree to: _____
- No Restraining order to be issued as I am the one who has been harrassed by the Respondent.**
- (Specify your reasons in item 25, page 5, of this form.)

This is not a Court Order.Judicial Council of California, www.courts.ca.gov
Revised July 1, 2015, Mandatory Form
Family Code, § 6209 et seq.**Essential Forms****Response to Request for Domestic Violence Restraining Order**
(Domestic Violence Prevention)**PARHAM**

DV-120, Page 1 of 5



Clerk stamps date here when form is filed.

FILED
JUL 08 2019By: 
SHARON K. RAAB, CLERK OF THE COURT
COUNTY OF CONTRA COSTA, CALIFORNIA

Fill in court name and street address:

Superior Court of California, County of CONTRA COSTA
751 Pine Street
P.O. Box 911
Martinez, CA 94553
Family Law

Fill in case number:

Case Number:
D19-02677

Case Number:
D19-026776 ☒ **Personal Conduct Orders**

- a. ☐ I agree to the orders requested.
- b. ☒ I do not agree to the order requested, ☒ but I would agree to: _____
No Restraining order is necessary.
(Specify your reasons in item 25, page 5, of this form.)

7 ☒ **Stay-Away Order**

- a. ☐ I agree to the order requested.
- b. ☒ I do not agree to the order requested, ☒ but I would agree to: _____
No Restraining order is necessary.
(Specify your reasons in item 25, page 5, of this form.)

8 ☐ **Move-Out Order**

- a. ☐ I agree to the order requested.
- b. ☐ I do not agree to the order requested, ☐ but I would agree to: _____
(Specify your reasons in item 25, page 5, of this form.)

9 **Guns or Other Firearms or Ammunition**

If you were served with form DV-110, Temporary Restraining Order, you must turn in any guns or firearms in your immediate possession or control. You must file a receipt with the court from a law enforcement agency or a licensed gun dealer within 48 hours after you received form DV-110.

- a. ☒ I do not own or have any guns or firearms.
- b. ☐ I ask for an exemption from the firearms prohibition under Family Code section 6389(h) because
(specify): _____
- c. ☐ I have turned in my guns and firearms to law enforcement or sold them to, or stored them with, a licensed gun dealer. A copy of the receipt showing that I turned in, sold, or stored my firearms
(check all that apply):
☐ is attached ☐ has already been filed with the court.

10 ☒ **Record Unlawful Communications**

- a. ☐ I agree to the order requested.
- b. ☒ I do not agree to the order requested, ☒ but I would agree to: _____
Both parties can record communications if further contact is made.
(Specify your reasons in item 25, page 5, of this form.)

11 ☐ **Care of Animals**

- a. ☐ I agree to the order requested.
- b. ☐ I do not agree to the order requested, ☐ but I would agree to: _____
(Specify your reasons in item 25, page 5, of this form.)

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Revised July 1, 2016

Essential
Forms

**Response to Request for Domestic Violence
Restraining Order**
 (Domestic Violence Prevention)

PARHAM

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→

Case Number:
D19-02677**12** ☐ **Child Custody and Visitation**

- a. ☐ I agree to the order requested.
- b. ☐ I do not agree to the order requested. *(Specify your reasons in item 25, page 5, of this form.)*
- c. ☐ I am not the parent of the child listed in form DV-105, *Request for Child Custody and Visitation Orders*.
- d. ☐ I ask for the following custody order *(specify)*: _____

- e. ☐ I do ☐ I do not agree to the orders requested to limit the child's travel as listed in form DV-108, *Request for Order: No Travel With Children*.

You and the other parent may tell the court that you want to be legal parents of the children (use form DV-180, Agreement and Judgment of Parentage).

13 ☐ **Child Support** *(Check all that apply):*

- a. ☐ I agree to the order requested.
- b. ☐ I do not agree to the order requested. *(Specify your reasons in item 25, page 5, of this form.)*
- c. ☐ I agree to pay guideline child support.

Whether or not you agree to pay support, you must fill out, serve, and file form FL-150, Income and Expense Declaration, or form FL-155, Financial Statement (Simplified).

14 ☐ **Property Control**

- a. ☐ I agree to the order requested.
- b. ☐ I do not agree to the order requested, ☐ but I would agree to: _____

(Specify your reasons in item 25, page 5, of this form.)

15 ☐ **Debt Payment**

- a. ☐ I agree to the order requested.
- b. ☐ I do not agree to the order requested, ☐ but I would agree to: _____

(Specify your reasons in item 25, page 5, of this form.)

16 ☐ **Property Restraint**

- a. ☐ I agree to the order requested.
- b. ☐ I do not agree to the order requested, ☐ but I would agree to: _____

(Specify your reasons in item 25, page 5, of this form.)

17 ☐ **Spousal Support**

- a. ☐ I agree to the order requested.
- b. ☐ I do not agree to the order requested, ☐ but I would agree to: _____

(Specify your reasons in item 25, page 5, of this form.)

Whether or not you agree, you must fill out, serve, and file form FL-150, Income and Expense Declaration.

This is not a Court Order.

Revised July 1, 2016

Essential
Forms

**Response to Request for Domestic Violence
Restraining Order**
(Domestic Violence Prevention)

PARHAM

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Case Number:
D19-02677**18** ☐ **Rights to Mobile Device and Wireless Phone Account**

- a. ☐ I agree to the order requested.
- b. ☐ I do not agree to the order requested, ☐ but I would agree to: _____

*(Specify your reasons in item 25, page 5, of this form.)***19** ☐ **Insurance**

- a. ☐ I agree to the order requested.
- b. ☐ I do not agree to the order requested, ☐ but I would agree to: _____

*(Specify your reasons in item 25, page 5, of this form.)***20** ☐ **Lawyer's Fees and Costs**

- a. ☐ I agree to the order requested.
- b. ☐ I do not agree to the order requested, ☐ but I would agree to: _____

(Specify your reasons in item 25, page 5, of this form.)

- c. ☐ I request the court to order payment of my lawyer's fees and costs.
Whether or not you agree, you must fill out, serve, and file form FL-150, Income and Expense Declaration.

21 ☐ **Payments for Costs and Services**

- a. ☐ I agree to the order requested.
- b. ☐ I do not agree to the order requested, ☐ but I would agree to: _____

*(Specify your reasons in item 25, page 5, of this form.)***22** ☐ **Batterer Intervention Program**

- a. ☐ I agree to the order requested.
- b. ☐ I do not agree to the order requested, ☐ but I would agree to: _____

*(Specify your reasons in item 25, page 5, of this form.)***23** ☐ **Other Orders** *(see item 22 on form DV-100)*

- a. ☐ I agree to the order requested.
- b. ☐ I do not agree to the order requested, ☐ but I would agree to: _____

*(Specify your reasons in item 25, page 5, of this form.)***24** ☐ **Out-of-Pocket Expenses**

I ask the court to order payment of my out-of-pocket expenses because the temporary restraining order was issued without enough supporting facts. The expenses are:

Item: _____ Amount: \$ _____ Item: _____ Amount: \$ _____

You must fill out, serve, and file form FL-150, Income and Expense Declaration.

This is not a Court Order.

Revised July 1, 2016

Essential
Forms

Response to Request for Domestic Violence
Restraining Order
(Domestic Violence Prevention)

PARHAMDV-120, Page 4 of 5
→

Case Number:
D19-02677**25** ☒ **Reasons I Do Not Agree to the Orders Requested**Explain your answers to each of the orders requested (*give specific facts and reasons*):☒ Check here if there is not enough space below for your answer. Put your complete answer on an attached sheet of paper and write "DV-120, Reasons I Do Not Agree" as a title.**Please see attached Declaration "DV-120, Reasons I do not agree".****26** Number of pages attached to this form, if any: _____

I declare under penalty of perjury under the laws of the State of California that the information above is true and correct.

Date: July 8, 2019**ASHLEY NICOLE PARHAM**

Type or print your name

▶ Ashley N Parham
Sign your nameDate: July 8, 2019**SHARON K. RAAB**

Lawyer's name, if you have one

▶ Sharon K. Raab
Lawyer's signature**This is not a Court Order.**

Revised July 1, 2016

Essential
Forms**Response to Request for Domestic Violence**
Restraining Order
(Domestic Violence Prevention)**PARHAM**

DV-120, Page 5 of 5

DV-120. REASONS I DO NOT AGREE

I, Ashley Parham, do not agree with the Petitioner's request for a DV Restraining Order.

Brief History:

1. I met the Petitioner, Shane Pearce, on the night of February 3, 2018.
2. At first, our relationship was more as friends with some flirtation going both ways.
3. Shane had been diagnosed with cancer prior to my meeting him and I tried to be caring and supportive. Shane would call me at all hours every week claiming he was depressed and needed someone to talk to. Shane told me I was the only one he could trust to talk to.
4. Eventually, our relationship became physical and I did have consensual sex with Shane on one occasion on March 11, 2018.
5. On March 23, 2018, Shane called me and asked me to come over between 3 and 4 a.m. He said he was really sick and was having trouble opening his medication bottles because he was going through chemotherapy.
6. Shane began forcibly trying to have me engage in sex with him. Although I did kiss him, he was hurting me and I asked him to stop. At his point, one of his friends came into the room (I do not know the name of this person).
7. Shane's friend began to rape me while Shane was watching. Shane then raped me and the two took turns raping me for about 30 minutes or so.
8. I had taken a sleeping pill earlier in the evening and was unable to move by this point or effectively fight them off. I tried to push them away but I was slapped and I "became frozen with fear" and "shut down".

RESPONDENT'S REPLY TO REQUEST FOR DV RESTRAINING ORDER
In Re Matter of Pearce/Parham – D19-02677

Page 1

9. I filed a police report with the Orinda Police (overseen by the CCC Sheriff's Department.) **SEE EXHIBIT A**
10. I had repeat HIV testing following this incident. See Doctor's letter. **EXHIBIT B**
11. I admit I was very angry and upset after the rape and sent Shane some angry emails asking him why he had done this to me when I had tried to be such a good friend helping him while he was sick. **SEE EXHIBIT C** for a sample of emails. At the advice of my therapist, I wrote these emails to express my pain and my feelings since the police did not follow up on the rape allegation.
12. On October 11, 2018, Shane came to my house at about 4 a.m. after sending me threatening emails. I was not home and my father had to confront him. **SEE EXHIBIT D**
13. Shane continued to threaten and harass me after I filed the police report about the rape. I was 5150'd once in August of 2018 due to his calls to the police but was not kept at the hospital where it was determined that I was not a danger to myself or others. (The medical record will be available for the court's review at the hearing.)
14. I tried my best with the help of my therapist and a priest at the Vatican (while on vacation in Europe with my parents), I tried to forgive Shane and told him so. **EXHIBIT E**
15. Shane has consistently reached out to me even when he said he had "blocked me". **EXHIBIT F**

RESPONDENT'S REPLY TO REQUEST FOR DV RESTRAINING ORDER
In Re Matter of Pearce/Parham – D19-02677

Page 2

16. In 2019, Shane has continued his contact with me, for example asking in January, 2019 if I would help with his laundry. In January, February and March of 2019 he tried to Facetime me and call me. **SEE EXHIBIT G.**
17. In April, 2019, Shane put my picture and phone number on social media claiming I was an escort. **SEE EXHIBIT H**

Current Status:

18. There is no basis for a restraining order in this case.
19. Not only have I never threatened Shane, he is the one who raped and threatened me.
20. I have blocked Shane from all my accounts, and he has allegedly done the same.
21. The April 2019 message I sent about my being listed as an escort was the last contact I have had with Shane.
22. In his pleadings, Shane states that I sent a series of annoying and harassing phone calls on June 13, 2019. This is absolutely not true.
23. Because of the threats he has made to me, I am very afraid of Shane and have no intention of contacting him again or being anywhere around him. He deleted his address on the pleadings he sent me so I don't even know where he lives.

What I am asking for:

24. I am asking that the court deny this request for a restraining order.

RESPONDENT'S REPLY TO REQUEST FOR DV RESTRAINING ORDER
In Re Matter of Pearce/Parham – D19-02677

Page 3

EXHIBIT A

Made in USA





DR No: 180004968

Sup No: ORIG

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OFFICE OF THE SHERIFF, CONTRA COSTA COUNTY

CA0070000

P.O. BOX 391, Martinez, California 94553-0039

Beat: 81

DV: No

ARREST: No

APPROVED BY: METH, MICHAEL

DR No. 180004968	Sup. No ORIG	Assignment ORI	Reported Date Tue 04/17/2018	Reported Time 1414	Status Prosecution Desired	Confidential? Yes	Empl. No./ID 77154
From Date Fri 03/23/2018	From Time 0300	To Date Fri 03/23/2018	To Time 0600	Report Incident Type 261	Use Of Force None		
Location 17 LOMA VISTA DR					City ORI	Zip 94563	
Offense No. 1	Offense PC261	Offense Description Rape (F)					
Evidence Yes	Fingerprint	Body Camera	Marsy's Law Yes	Elder Abuse From SOC 341	Victim Response - 293 PC	Missing/Stolen Value	Damaged Value

SYNOPSIS

This report concerns Suspect-Shane Pearce and an unknown suspect having non consensual sexual intercourse with Vic-Ashley Parham at Pearce's residence at 17 Loma Vista Drive in Orinda.

Parham desires prosecution in the case

At the time of this report Pearce has not provided a statement. The other suspect in the case has not been identified.

SUBJECTS

Person Reporting and Victim	Invl. No 1	Type Individual	Name PARHAM, ASHLEY NICOLE														
	Race	Gender	DOB	AGE	To Age	Height	To Height	Weight	To Weight	Juvenile? No							
	Hair Color	Eye Color	Skin	General Appearance		Built	Clothing Description										
	Hair Description	Facial Features			Speech	Demeanor			Deformity								
	Further Description																
	Address Type Home	Location 1610 BELLFLOWER PL.					City WALNUT CREEK			State CA	Zip 94596						
	ID Type Operator License	ID No. 89529806			Operator License State California												
	Offense Link Victim	Offense PC261			Phone Type Cell			Phone Number (925) 639-7855									
	Email Type	Email															
	Mark Type	Mark Code			Mark Description												
	Employer / School					Position / Grade					Empl. From Date		Empl. To Date				
	Empl. Location					Empl. City					Empl. State		Empl. Zip				
	Empl. Contact					Empl. Phone Type					Empl. Phone						

Distribution
ORINDA PD,

CONTRA COSTA COUNTY
OFFICE of the SHERIFF

JUL 01 2018

Additional Routing

Reporting Deputy (Print) Ladner, Joseph	Date / Time Written 4/25/2018 08:21:02	Disposition Referred
Approving Supervisor(Print) METH, MICHAEL	Supervisor No. 66250	Date 4/26/2018



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OFFICE OF THE SHERIFF, CONTRA COSTA COUNTY

Beat: 81

CA0070000

DV: No

P.O. BOX 391, Martinez, California 94553-0039

ARREST: No

Suspect	Invl. No 1	Type Individual	Name PEARCE, SHANE PAUL										
	Race White	Gender Male	DOB	AGE 40	To Age	Height 601	To Height	Weight 190	To Weight	Juvenile? No			
	Hair Color Brown	Eye Color Brown	Skin	General Appearance	Build	Clothing Description							
	Hair Description	Facial Features	Speech	Demeanor	Deformity								
	Further Description												
	Address Type Home	Location 17 LOMA VISTA DR	City ORINDA	State CA	Zip 94563								
	ID Type Operator License	ID No.	Operator License State										
	Offense Link Suspect	Offense PC261	Phone Type Cell	Phone Number									
	Email Type	Email											
	Mark Type	Mark Code	Mark Description										
	Employer / School	Position / Grade				Empl. From Date	Empl. To Date						
	Empl. Location	Empl. City				Empl. State	Empl. Zip						
	Empl. Contact	Empl. Phone Type				Empl. Phone							
	Suspect	Invl. No 1	Type Individual	Name UNKNOWN, UNKNOWN									
		Race White	Gender Male	DOB	AGE 35	To Age 40	Height 600	To Height 601	Weight 180	To Weight 200	Juvenile? No		
Hair Color Brown		Eye Color Brown	Skin	General Appearance	Build	Clothing Description							
Hair Description Short Hair		Facial Features Full Beard	Speech	Demeanor	Deformity								
Further Description Unknown suspect, Pearce's friend													
Address Type		Location	City	State	Zip								
ID Type		ID No.	Operator License State										
Offense Link Suspect		Offense PC261	Phone Type	Phone Number									
Email Type		Email											
Mark Type		Mark Code	Mark Description										
Employer / School		Position / Grade				Empl. From Date	Empl. To Date						
Empl. Location		Empl. City				Empl. State	Empl. Zip						
Empl. Contact		Empl. Phone Type				Empl. Phone							
VEHICLES													
Distribution ORINDA PD,													
Additional Routing													
Reporting Deputy (Print) Ladner, Joseph					Date / Time Written 4/25/2018 08:21:02		Disposition Referred						
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OFFICE OF THE SHERIFF, CONTRA COSTA COUNTY

CA0070000

P.O. BOX 391, Martinez, California 94553-0039

Beat: 81

DV: No

ARREST: No

VESSELS							
PROPERTY							
Evidence	Inv. Date	Article			Serial No.	In Custody?	# Pieces
	04/17/2018	Clothing				No	2
	Value	Owner Applied Number	Description				
			Underwear and bra for DNA testing				
	Tag Number	Item Number	Disposition	Disposition Date	Storage Area		
	Link Owner	Involvement Person Reporting and Victim	Name				DOB
			PARHAM, ASHLEY NICOLE				
MODUS OPERANDI							
NARRATIVE							
<p>On 4-17-2018 at 1414 hours, I was dispatched to a report of a rape that occurred on 3-23-2018 at 17 Loma Vista Drive in Orinda. Vic-Ashley Parham reported Sus-Shane Pearce and an unknown suspect had sexual intercourse with her at Pearce's residence. Parham reported she saved the underwear she wore that day.</p> <p>I contacted Parham by telephone at her request. I asked Parham to come to the Orinda Police Department to report the incident to me in person. Parham agreed and arrived at the Orinda Police Department. Parham, identified by her California driver's license provided me with the following statement in summary:</p> <p>Parham met Pearce at Dan's Irish Sports Bar located at 1524 Civic Drive in Walnut Creek on 2-3-2018. Pearce was at the bar celebrating his 40th birthday with his friends. Parham and Pearce began to talk and flirt with each other at the bar. Parham and Pearce kissed each other at the bar. Parham and Pearce continued to talk and drink alcohol. Parham stated she got shy and looked down. She felt a hand move her face up and she kissed Pearce again. Parham opened her eyes and noticed that she did not kiss Pearce, but she kissed his friend who looks like Pearce. Parham did not know Pearce's friend's name, but she called him Pearce's twin due to their similar looks.</p> <p>Later that night Parham and Pearce along with Pearce's friends went to Mr. Lucky's bar located at 1527 Lucust Street in Walnut Creek. Parham reported that she was raped in the bathroom at Mr. Lucky's by an unknown suspect. Parham believes the suspect is a friend of Pearce's, but she could not remember much because she was heavily intoxicated. Parham report the incident to Walnut Creek Police Department (WCPD report number 18-7665)</p> <p>Parham stated she has been a victim of sexual assault many times and started when she was very young. Parham said she has post-traumatic stress disorder (PTSD) from previous sexual assaults.</p> <p>Parham and Pearce continued to talk and text message each other after that night. Parham stated Pearce was fighting cancer and they both enjoyed talking with each other about their respective issues with Parham's PTSD and Pearce fighting cancer. On 2-18-2018 Parham and Pearce hung out together at his house in Orinda. Parham stated they did not have sexual intercourse that night but did kiss. Parham described Pearce at this point in their relationship at a "Perfect Gentleman."</p> <p>On 3-11-2018 Parham and Pearce had consensual sexual intercourse at Pearce's friend's house in Walnut Creek.</p> <p>On 3-13-2018 Parham received a video call from Pearce and his friend the "twin". Pearce asked Parham to come over</p>							
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<div style="text-align: center;"> CONTROL CONTRA COSTA COUNTY OFFICE of the SHERIFF </div>							
Additional Routing							
Reporting Deputy (Print) Ladner, Joseph				Date / Time Written 4/25/2018 08:21:02		Disposition Referred	
Approving Supervisor (Print) METH, MICHAEL				Supervisor No. 66250		Date 4/26/2018	



DR No: 180004968

Sup No: ORIG

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OFFICE OF THE SHERIFF, CONTRA COSTA COUNTY

CA0070000

P.O. BOX 391, Martinez, California 94553-0039

Beat: 81

DV: No

ARREST: No

to have sex with him and his friend. Parham declined and did not come over to Pearce's house.

On 3-23-2018 at 0300 hours, Pearce Called Parham and asked her to come over to his house because he was not feeling well due to cancer treatments. Parham was asleep and stated she took a sleeping pill before going to bed that night. Parham said she was surprised that she woke up when Pearce called her. Parham drove to Pearce's house. Pearce drove Parham up to Grizzly Peak Road to enjoy the view. About an hour later both Pearce and Parham went back to his house. Both Pearce and Parham ate edible marijuana. Parham stated she became extremely intoxicated between the sleeping pills and the marijuana. Pearce began to kiss Parham. Parham stated she was not expecting to have sex with Pearce because he said he was not feeling well.

Parham stated she was extremely intoxicated, sleepy, and could not move. Pearce then placed multiple fingers inside of Parham's vagina causing pain. Pearce then inserted his penis inside of her vagina and began to have sexual intercourse with her. Pearce then flipped Parham on to her stomach, and she was not face down. Parham then stated another man began to have sex with her while she was face down. Later she was able to see that the other man was Pearce's friend "The twin." Pearce and his friend took turns having sex with Parham. Parham stated she could not fight because she was intoxicated. Parham stated Pearce and "The twin" took turns have sexual intercourse with her for approximately 30 minutes. Parham was unsure if Pearce ejaculated inside her vagina. "The twin" was the last suspect to have sexual intercourse with her and Parham believes he did ejaculate inside of her vagina. Parham stated the two men did not touch her at the same time or commit any sexual acts at the same time with her.

After "The twin" finished he rolled over and laid next to Parham for a few minutes. Parham was unsure where Pearce was when "The twin" was laying next to her. Parham felt "The twin" get off the bed and he left. Pearce then laid down next to Parham on the bed. Parham fell asleep on Pearce's bed. She woke up later in the morning and went to Geppetto's Caffe located on Orinda Way and got breakfast for Pearce and herself. She then returned to Pearce's house and had breakfast with him. Parham then left after breakfast.

Parham did not speak to Pearce for a few days. On 3-26-2018 Parham went to Harborside marijuana dispensary located at 1840 Embarcadero in Oakland. When Parham was there, she saw "The twin" who was working as security at the dispensary. Parham did not speak to "the twin," but she did make eye contact with him. At 1645 hours, Parham sent Pearce a text message saying that she saw his twin at Harborside. Pearce did not respond to her text message.

Parham described Pearce's friend ("The Twin") as a white male adult approximately 35 to 40 years old, 6 feet tall with a thin build. Brown hair with brown eyes and a short beard. Parham could not provide any further description of the other suspect other than he looks like Pearce.

Parham and Pearce sent a few text messages back and forth then on 4-7-2018 at 1608 hours, Parham sent Pearce a text message "WHY DID YOU RAPE ME WITH YOUR FRIEND?" Pearce responded back with "Excuse me?!!!" I took photographs of the text message conversation, see attached. Pearce did not admit to any of the allegations that he raped Parham

I asked Parham why she did not yell or scream to stop. Parham stated she was frozen and was unable to be verbal due to her level of intoxication. Parham stated that she has been sexually assaulted many times in the past and when Pearce and his friend began to have sex with her she "shut down."

Parham said she saved the underwear and bra that she was wearing that day. Parham provided me with the underwear

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Additional Routing			
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Approving Supervisor(Print) METH, MICHAEL	Supervisor No. 66250	Date 4/26/2018	



DR No: 180004968

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OFFICE OF THE SHERIFF, CONTRA COSTA COUNTY

Beat: 81

CA0070000

DV: No

P.O. BOX 391, Martinez, California 94553-0039

ARREST: No

which I booked into Orinda Evidence.

I attempted to call Pearce on 4-17-2018 at 1639 hours. I left a voicemail for Pearce to call me. On 4-18-2018 at 1336 Pearce called the Orinda Police Department. Officer Brooks advised Pearce of my work schedule and to call back when I returned to work.

On 4-22-2018 at 1518 hours I called Pearce again and left a voicemail to call me. At 1612 hours I went to 17 Loma Vista Drive to contact Pearce. Pearce was not home; I left my card on the front door with a note to contact me.

On 4-23-2018 at 0830 hours I called Pearce and left a voicemail for him to call me. I went to his house at 0838 hours, and no one was home.

On 4-24-2018 at 0930 hours I called Pearce and left a voicemail for him to call me.

On 4-24-2018 at 1044 hours I faxed a request for a copy of the Walnut Creek Police report (18-7665). At the time of this report I have not received a copy of the police report from Walnut Creek Police Department.

At the time of this report, I have not been able to contacted Pearce for a statement. I also have not been able to identify Pearce's friend.

Distribution
ORINDA PD,

Additional Routing

Reporting Deputy (Print)
Ladner, Joseph

Date / Time Written
4/25/2018 08:21:02

Disposition
Referred

Approving Supervisor(Print)
METH, MICHAEL

Supervisor No.
66250

Date
4/26/2018

Made in USA

EXHIBIT B

CHARLENE SPENCER, MD
FAMILY MEDICINE

112 La Casa Via • Suite 350 • Walnut Creek, CA 94598
Phone 925 947 0414 • Fax 925 932 6560

3-26-18

Hi Ashley,

Here are lab slips for repeat
HIV testing at 4-6 wks, 3mos and
6mos after assault. Please call
me when you have the labs
drawn so we can schedule a
day for you to get your results.

Take care -

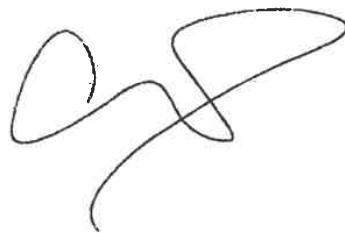




EXHIBIT C



Ashley "Niki" Parham <ashleynparham@gmail.com>

5months exactly

Ashley Parham <ashleynparham@gmail.com>

Thu, Aug 23, 2018, 5:16 AM

To: Shane Pearce <shane4hire@gmail.com>, haas27@hotmail.com <haas27@hotmail.com>, pearce4hire@yahoo.com <pearce4hire@yahoo.com>

FUCK YOU SHANE PEARCE!!!

FUCK YOU FOR RAPING ME WITH YOUR FRIEND EXACTLY 5 MONTHS AGO FROM TODAY AT THIS EXACT TIME.

Fuck you for living like nothing happened while I suffer everyday from what you did.

Fuck you for setting me up to be raped by your friend you won't name. Fuck you for not protecting me and pulling him off me like a real man would have. FUCK YOU.

FUCK YOU FOR "DESTROYING" ME BECAUSE IM "FRAGILE" JUST LIKE YOU WANTED.



Ashley "Niki" Parham <ashleynparham@gmail.com>

WTF was that threat about last night????

4 messages

Ashley Parham <ashleynparham@gmail.com>

Thu, Sep 6, 2018, 6:32 AM

To: Ashley Parham <nikashley@icloud.com>, Shane Pearce <shane4hire@gmail.com>, haas27@hotmail.com <haas27@hotmail.com>, pearce4hire@yahoo.com <pearce4hire@yahoo.com>

Shane Paul Pearce,

Why did you or your friend just threaten me with "bad things" going to happen??? They already have when I was assaulted. I don't care if you kill me Shane. You destroyed me the night I came over to help you at 4am cuz u pretended to be sick with cancer & needed me to come over just to assault me. In March you could have just pulled him off me instead of hurting me with him & randomly telling him to not hurt me further. What have I done to you to deserve being raped??? I thought I was being a good friend checking in on you because I care, while you just saw me as prey to mess with.

Even though you Shane don't deserve my forgiveness for what your friend & you raping me has negatively done to my life, or my sympathy for you if you actually have cancer... I somehow have a little bit for you alone even though you have made zero effort to make things right and name your friend, give me closure, or ya know had pulled him off me like you should of. You're actions changed my life dramatically that night for the worst & I hope one day you truly understand the impact of your actions on others and get help in order to stop destroying people to the point suicide seems like the only action left. You could of had a good friend in me but you chose me as nothing more than prey to get off on and laugh at my pain. The difference between you and me is I would of dropped everything to be there for you when you're in need like I do for real friends & did for you THAT night (cause I stupidly thought we had a real connection when in reality I was just prey) and you never saw me even as a potential friend or anything positive. I was just easy pickings for you to fake a friendship just enough to gain my trust and break it and my heart & soul by what looks like a plan to rape me from the beginning. You never were interested. I was just prey to rape later for you're entertainment. What did I do so bad to you that you think I deserved this?

So what "bad things" are coming my way from that phone convo threat around 2am???

Fuck you & your friends for fucking with me on the phone and actually threaten me with bad things happening at my address after everything that's happened to me.

Threatening me tonight means jack shit to me Shane... I'm not afraid of you. I don't give a fuck if you kill me or had killed me March 23rd. It would of been kinder of ya than faking being my friend to get me over & let that sick fuck friend of yours hurt me. I don't understand why you would let your friend hurt me when you alone could of had it purely consensual. I guess it's more about power over me that you wanted than sex. Why did you want to hurt me when I came over to help you?!?! I'll never understand.

Ok so... ya had fun tonight being drunk & fucking with me with even more of your friends after everything your friend & ya did. Congrats on having fun off the pain you caused Shane. Whoever threatened me needs to fuck off. I'm guessing the threat came from you Shane or the unnamed friend who assaulted me worse. You should of pulled him off me!!!! How would you like it if someone did what you two did to your kid.

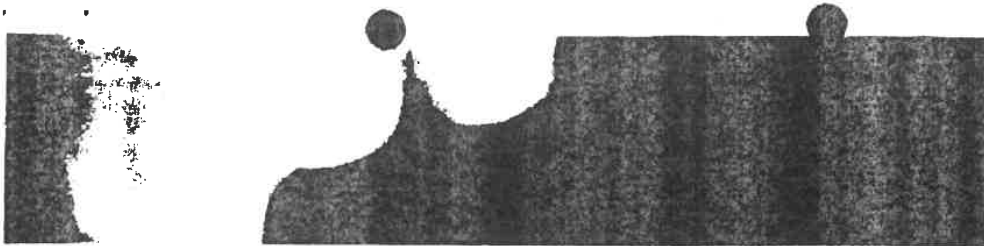
Fucking get help if that's acceptable behavior to you. And get help for drinking and whatever else you do that makes you feel the need to be fucked up all the time and unconcerned with how your actions hurt those around you including the horrible pain you caused me after faking being a good man.

I don't know why people like you get off on hurting repeatedly sexually abused women like me for fun. Especially one who's been through it since childhood. Why did I have to be your prey instead of a friend or some chick you never spoke to!!! I didn't deserve what happened to me. I stupidly hoped you would of been innocent and he took advantage of you too but all your actions prove how little you think of me. I'm basically less than trash to you. BUT... Threatening me further over my phone & address equaling bad things for me is fucked up!!!! I deserve better than this. I deserved better from you Shane. I didn't deserve worse PTSD. I didn't deserve the first person I was stupid enough to trust to get intimate with in 6 years would flip on me and let his friend rape and destroy my life and faith in humanity. Fuck you for wanting me to kill my self and destroy me because I'm fragile from a life time of abuse you'd probably find funny.

I really wish you could of just been the guy I hung out with the 1st night at your place and the 2nd at dales instead of what you ended up being. I don't understand why you are ok with what happened to me and have no remorse or ability to apologize. But why would you care when that nice guy persona was just an act.

Hope your threat was valid but at the same time I don't care if you kill me after what you did.

Even though you only saw me as worthless prey... I genuinely hope you are cancer free and healthy. It must be nice to



-ashley the bitch you only care to taunt laugh at and abuse with your friends.

Ashley Parham <ashleynparham@gmail.com>

Thu, Sep 6, 2018, 6:31 PM

To: Ashley Parham <nikashley@icloud.com>, Shane Pearce <shane4hire@gmail.com>; haas27@hotmail.com <haas27@hotmail.com>, pearce4hire@yahoo.com <pearce4hire@yahoo.com>

Btw... please thank your "friend" or random guy at the bar from last night who had your phone and literally said "I didn't deserve any of it" about what your friend and you did to me. I needed to hear that. At least you have one friend with a conscience other than dale who seems decent to not want to inflict pain on me or others. I hope you get the help you need to fix whatever is inside you that needed to have power over me and cause me extreme pain & bring back my ptsd to the extreme, which I had been so proud of myself for finally managing it w/o meds & getting myself back on my feet to start my own business in 2018 before I met you & you decided I was just prey & changed the course of my life.

I genuinely hope you're cancer free/feeling healthy from all that crap you were going through and choose to make a change to better yourself and your health & confront your addiction and issues that made you not see me as human worthy of kindness & being friends. Instead you wanted to destroy me while I wanted to help you & be there for you during your cancer in any way you needed.

I didn't deserve what happened at your house in March. I went over to your house to help you & be there for you cause I care I deserved you protecting me from your sick friend instead of what happened. I deserved so much better treatment for coming over at the drop of a hat that night to come take care of you and make you feel better. I don't understand why people love to hurt me this deeply.

I wish I never let you gain my trust & give you the chance to pretend to be such a kind caring guy who kept calling to check in on me to see if I was ok/talk/make me laugh/pretend to care & be there for me over the assault in WC bar! Also don't understand why you'd make the effort to take me out of a room to avoid a rape scene in a movie to protect me but didn't give a fuck to protect me from your disturbed friend you won't name. Even the night of the assault at your place you sounded stressed while telling him not to hurt me further. I'll never understand why you flipped on me or most likely you never cared and it was all part of the plan to gain my trust to hurt me more later because I'm an easy target

Like many victims of assault I've been struggling w/ my selfworth, ptsd, severe depression and suicidal thoughts because I'm extremely desperate to find a reason why YOU did this to

me!?!?? Sadly I'll never receive the answer to why you did it, why you didn't see me as a human worthy of life or friendship, or why you gained my trust just to destroy me... because the answers all lie in your heart which I have zero access to in order to heal myself from what happened.

Do you even understand that You were the first person in 6-7 years I was able to trust enough to be intimate with & let touch me because you were so good at pretending to be my friend and so kind to keep checking in on me to see if I was ok. I thought I had found an amazing friend in you & was extremely grateful for that friendship untill you full flipped on me and chose to assault me with your disturbed unnamed friend.

Before you gained my trust to assault me (with your obviously more guilty, sick & demented friend in March) I had regained my sense of feeling safe in the world and you took that away from me. You have made me feel worthless, not even human, not worthy of kindness/love/ or respect. Your choices have irreparable changed my life forever while you get to live your life like nothing happened and lie to the world that I'm just some crazy liar which works perfectly for you in a world where everyone especially cops care more to victim blame than do police work & the fact that "A women's anger never goes unpunished" even if justified. Your lucky I have no one who cared to help me even tho it was your friend who belongs behind bars. You on the other hand need mental help to better yourself. Your friends a lost cause and will only get worse.

Good luck hanging with a guy who literally said he wanted to fuck your daughter Trinity in a creepy rapist stalker way. I hope you at least protect her from that unnamed friend & warn her of him to keep her safe. SHE DOESN'T DESERVE THIS PAIN FROM YOUR FRIEND OR ANYONE & I HOPE YOU HAVE SERIOUSLY LISTENED TO ME ABOUT WHAT HE HAS INSINUATED ABOUT DOING TO YOUR DAUGHTER AND PROTECT HER LIKE YOU DIDN'T PROTECT ME FROM HIM.

PLEASE DONT LET HIM HURT HER TOO. SHE DESERVES TO LIVE LIFE NOT KNOWING THIS TYPE OF PAIN.

[Quoted text hidden]

Ashley Parham <ashleynparham@gmail.com>

Thu, Sep 6, 2018, 7:47 PM

To: Ashley Parham <nikashley@icloud.com>, Shane Pearce <shane4hire@gmail.com>, haas27@hotmail.com <haas27@hotmail.com>, pearce4hire@yahoo.com <pearce4hire@yahoo.com>

What I take away from the threat I received last night from you and your friends is: The fact you know my phone number means you know where I live, and bad things are going to happen.

Bad shit already happened.

I don't care if I die so why should I care about "bad things happen"...ing to me? Living after being raped by someone you trusted is the most painful thing YOU could have done to me. Killing me that night would of been a blessing.

I'm not afraid of you or your unnamed rapist friend knowing where I live. I'm guessing only your unnamed rapist friend would want to do that anyways. You seemed smarter & like you might have a bit of a conscience. But... I was wrong about you being that kind caring guy when you're a Jekyll and Hyde.

Either way... you're two white men so you can get away with anything you want. While rape victims get ignored, villainized, blamed and shamed into silence and isolation by the rapists/their friends, cops, & society.

[Quoted text hidden]

them like he did me. I hope you protect them unlike how you tossed me to the predator. I hope you get to live the rest of your life cancer free & never have to suffer from being raped the way I was by you two. I wish you the best in life and are able to make positive changes to stop causing destruction in others life's like mine. I hope I can find some form of strength to get through this brutal pain you caused me and not fall victim to the statistics of killing myself in a ptsd thoughtless autopilot tactical state of mind where I'm not fully aware to stop myself like I almost did in 2011 after an assault. You reignited that part of my ptsd I had under control for years. Now I'm afraid of what my future holds because of what you chose to do to me, my life, and my survival. I hope you take a lot of time and look deep in yourself with a therapist to figure out why you did it and how you could/can treat me as a subhuman cumdumpster to abuse for fun. I hope you get help and change for the better and find reasons for your actions and never assault someone else with or without that disturbing friend of yours. Your "drunken can't remember" abuse is not a good answer. I wish you had cared just the tiniest bit about me to have protected me from your psycho rapist friend or admitted his name since he will only get worse & bring you & other innocent girls down with him. But sadly u are with him & my Stockholm syndromes desperation for you to be innocent and it just be him guilty is unrealistic and just wishful thinking that the one person(YOU). I was stupid enough to let my guard and walls down for you and I actually wanted to get to know you and felt safe enough to be intimate with you after not letting people touch me for 7 years. The fact I stupidly fell for your kind act just to get assaulted again after 7years of avoiding men and friend zoning everyone is tragic. Especially because I'm never interested in anyone in that way & the one I choose to trust & care for ended up being just another abuser like my ex husband only you upped the time frame

I hope one day I can live free from the pain you caused me and go outside and live my life like normal people or people like you who get to walk around like nothing happened and not in fear of more "bad things happening" to me from u and your friends from last nights bar. It's not fair you can go on hikes in nature all alone. Hiking around the bay is one of my favorite things to do & you took that away from me too because I'm afraid to run into you and your unnamed friend since you like the outdoors as much as I do. I've barely left my bedroom since you assaulted me I lost all faith in humanity

[Quoted text hidden]



EXHIBIT D



Shane Pearce

to me

[Hide details](#)

From Shane Pearce shane4hire@gmail.com

To Ashley Parham ashleynparham@gmail.com

Date Oct 11, 2018, 4:12 AM

Security  Standard encryption (TLS) [Learn more](#)

Im coming Calli me

Sent from my iPhone



Shane Pearce

to me

[Hide details](#)

From Shane Pearce shane4hire@gmail.com

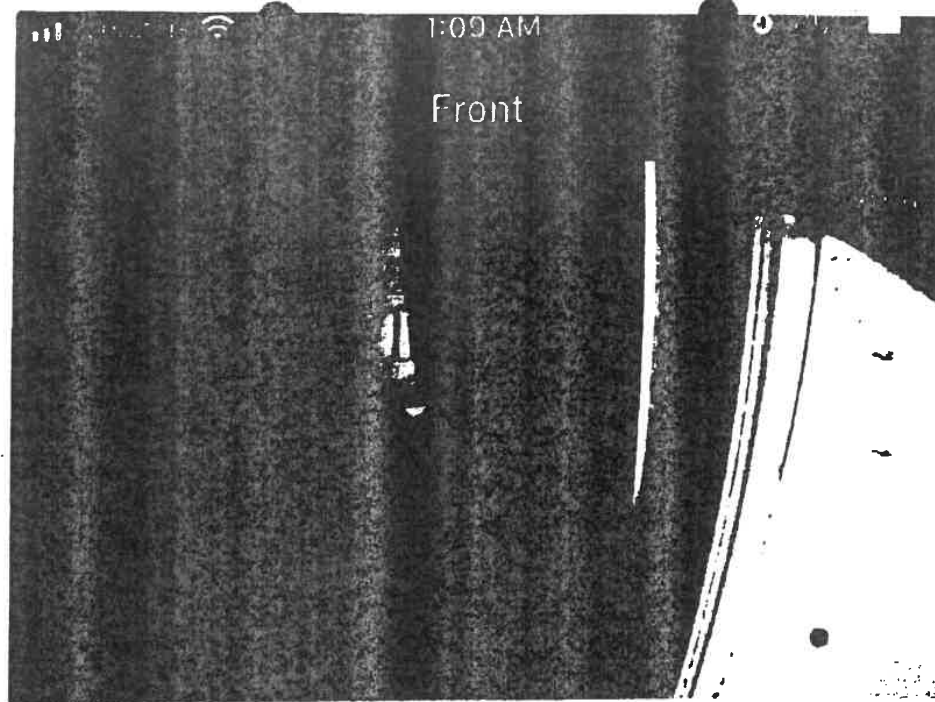
To Ashley Parham ashleynparham@gmail.com

Date Oct 11, 2018, 4:15 AM

Security  Standard encryption (TLS) [Learn more](#)

Unlock you

Sent from my iPhone



Yesterday, 10/11

People X



5:01a
Motion



4:50a
Motion



4:46a
Motion



4:45a
Motion

I, Ashley Parham, have a ^{video} copy of Shane Paul Pearce showing up uninvited to my house demanding to see me to my father. I was at my boyfriend's house. This was the 4th time Shane has shown up uninvited to my house since raping me in March 2018. This is the only time the door was answered. I kept the video because I became afraid he would hurt my family. - Ashley P.

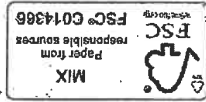


EXHIBIT E



Ashley "Niki" Parham <ashleynparham@gmail.com>

Regrets... I have a few with you!

Ashley Parham <ashleynparham@gmail.com>

Thu, Oct 18, 2018, 12:09 PM

To: Shane Pearce <shane4hire@gmail.com>, pearce4hire@yahoo.com <pearce4hire@yahoo.com>

Shane, I truly hope I am blocked and you didn't get these messages. Thank God I'm at the Vatican today to heal my soul. I got blessed in the Sistine Chapel after confession of the sexual abuse I suffered as a kid & adult & the February rape & your friend incident. He gave me the best advice on it all & blessed me & felt true healing & peace for the first time in months. I truly hope the best for you in life. I understand you don't want to know me. I genuinely forgive you for hurting me even though you can't see that you have and I'm trying very hard to find true forgiveness in my heart for all the abuse I've suffered in 35 years. I don't know what else to say to you other than I have forgiveness & love in my heart for you & wish you the best in life & good health. I will delete your number and emails from my phone to give you peace. 🙏 take care of yourself & stop smoking cigs. Your daughters deserve their father to stay around and support them... not live the unhealthy lifestyle you live after surviving cancer. Bye Shane.



EXHIBIT F

12:54



Shane Pearce Sep 29, 2018



to me ^

From Shane Pearce shane4hire@gmail.com

To Ashley Parham ashleynparham@gmail.com

Date Sep 29, 2018, 4:30 AM



Standard encryption (TLS)

[Learn more](#)


Call me back please

Sent from my iPhone





EXHIBIT G

1:28   



Shane >

Mon, Jan 21, 11:03 PM

I need help with my laundry

Tue, Jan 22, 12:23 AM

I can help ya tomorrow if ya need help

Ever find my earring?

Lol you're hella random when you actually respond

So... are you ok? or you trying to get me to be you're maid too

Tue, Jan 22, 8:51 AM

Saying ya annoys me

Tue, Jan 22, 9:55 AM

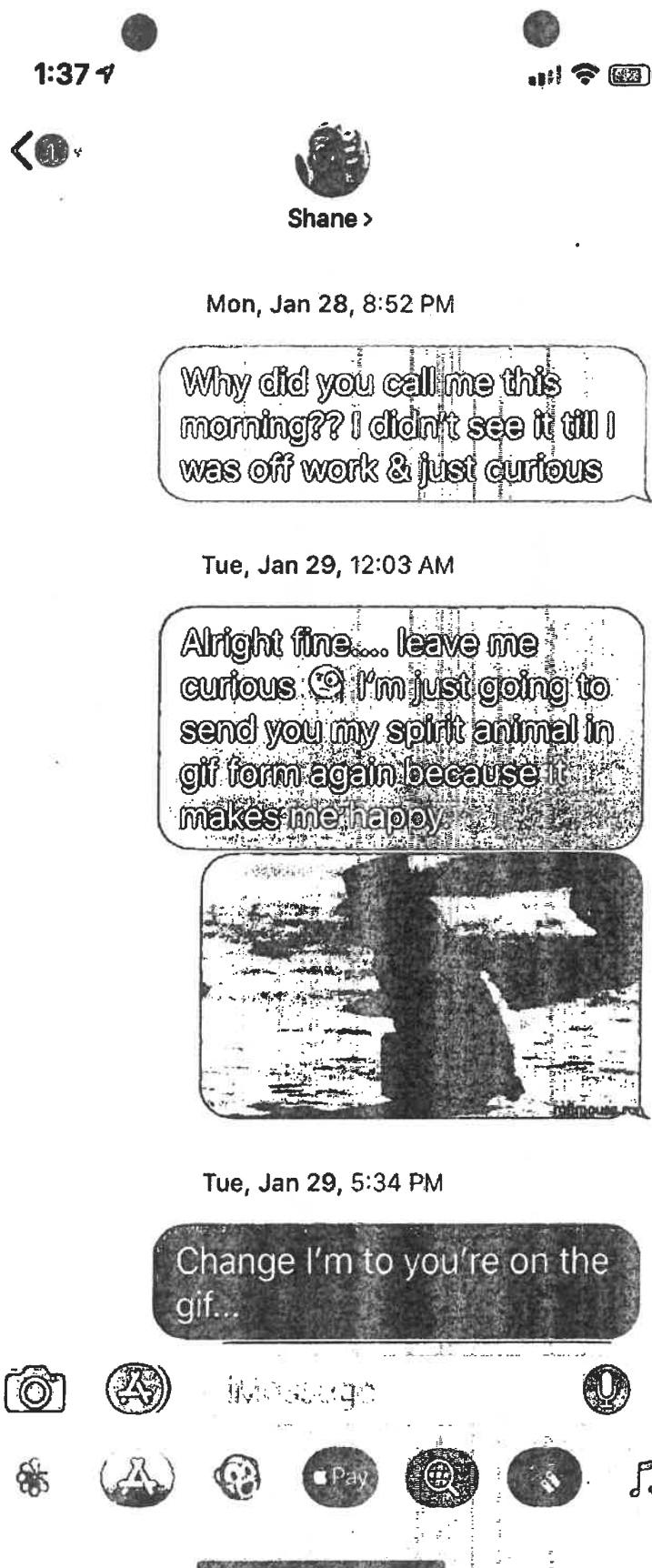
I have a good day



pressing



I, Ashley Parham,
 ← was never
 going to
 go over there
 again. I was
 just playing
 nice because
 I nicely
 thought he
 would finally
 admit who
 his un-named
 friend was.
 It was
 extremely
 stupid of me
 to think I
 could get him
 to confess.
 I regret acting
 nice after
 he hurt me
 so horribly.
 A.P.



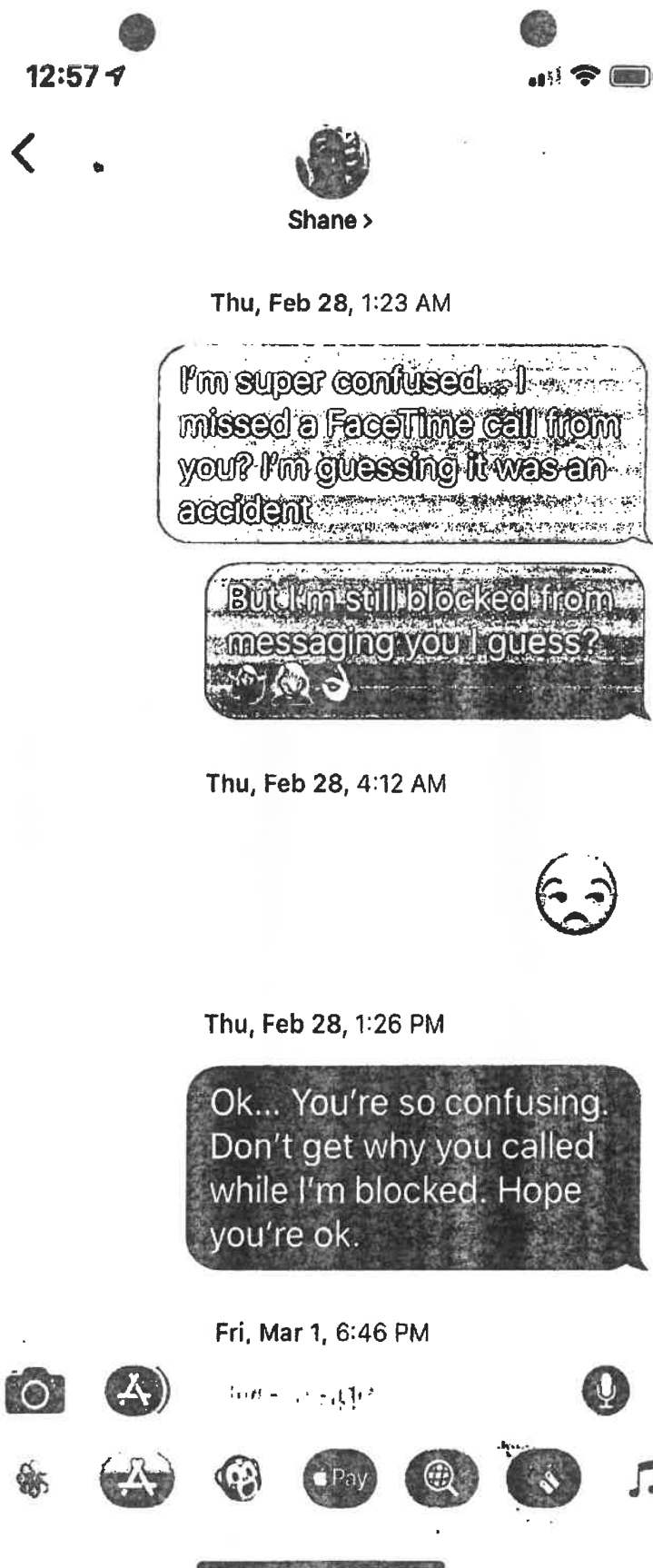




EXHIBIT H



Ashley "Niki" Parham <ashleynparham@gmail.com>

WTF!!!!!!

Ashley Parham <ashleynparham@gmail.com>

Fri, Apr 12, 6:56 PM



To: Shane Pearce <shane4hire@gmail.com>, haas27@hotmail.com <haas27@hotmail.com>, pearce4hire@yahoo.com <pearce4hire@yahoo.com>, shane4hire@yahoo.com <shane4hire@yahoo.com>



Shane >

name on your lips asshole!
How many ways can you be
a complete jerk? Begging
me in the middle of the
night acting desperate for
my help with your ALS
problems when you were
just fine & using my
kindness and empathy for a
weakness is beyond low.
And now all this bullshit
you're spreading about me
is fucked up. Stop.

Today 6:18 PM

  did you put my phone
number and some photo on

an escort site???!!!!!!
WTF!!!!!! I don't deserve
this shit

You're the only one who
hates me and is cruel
enough to do that!!!!

I know you only have "cruel intentions" towards me and get off on hurting me but if you put my number on an escort site you are fucked up beyond anyone I've ever dealt with!!!!!! This isn't funny.

Exhibit “C”

DECLARATION OF GRIGOR VAHANYAN

I, Greg VAHANYAN, declare as follows:

1. I am the President of Red Limo Line, LLC (“Red Limo”), a car service in Los Angeles, CA. I have personal knowledge of the matters set forth herein. If called upon and sworn as a witness, I could and would competently testify to the matters set forth herein.

2. Since April 1, 2015, I have operated Red Limo, a private car service in Los Angeles, California. In addition to my duties as President, I regularly drive Red Limo customers.

3. Red Limo was hired by Odell Beckham, Jr. to provide him with car service from, among other times, March 20, 2018 through March 24, 2018 while he was in Los Angeles, California. I personally drove Mr. Beckham, and his guests, on those dates.

4. As is the regular course and practice of Red Limo and myself, I maintain on Apple Notes on my iPhone a running record of my hours working for a client. I update the Note each day with the hours that I am working and, if an additional driver was working, the hours that they report to me at the end of their shift. Attached hereto as Exhibit “A” is a true and correct copy of my record of hours for the above mentioned time period.

5. As set forth in Exhibit “A”, I started work for Mr. Beckham on March 22, 2018 at 9:30 a.m., and continued working with him until 6:00 p.m. when I dropped him off at his home on Solar Drive.

6. I returned to Solar Drive to drive Mr. Beckham on March 23, 2018 at 12:30 p.m. We left Solar Drive at approximately 2:30 p.m. in order to take him to a training session. I was working with Mr. Beckham until 4:30 a.m. the morning of March 24, 2018, when I dropped him off at his home on Solar Drive. Due to the late hour, I slept in a guest room at Mr. Beckham’s home, and then started driving him again at 9:30 a.m. that morning when I took him to Santa Monica Beach.

1 7. At all times that I was driving Mr. Beckham during the period March 20,
2 2018 through March 24, 2018, the dates and times of which are reflected on Exhibit "A",
3 we were in the greater Los Angeles area, including trips to the Velo Sports Center in
4 Carson, CA.

5 8. Additionally, Mr. Ajay Sangha, who I understand is both Mr. Beckham's
6 friend and business partner, was with Mr. Beckham when I drove them to the various
7 locations on March 22, 23 and 24, 2018.

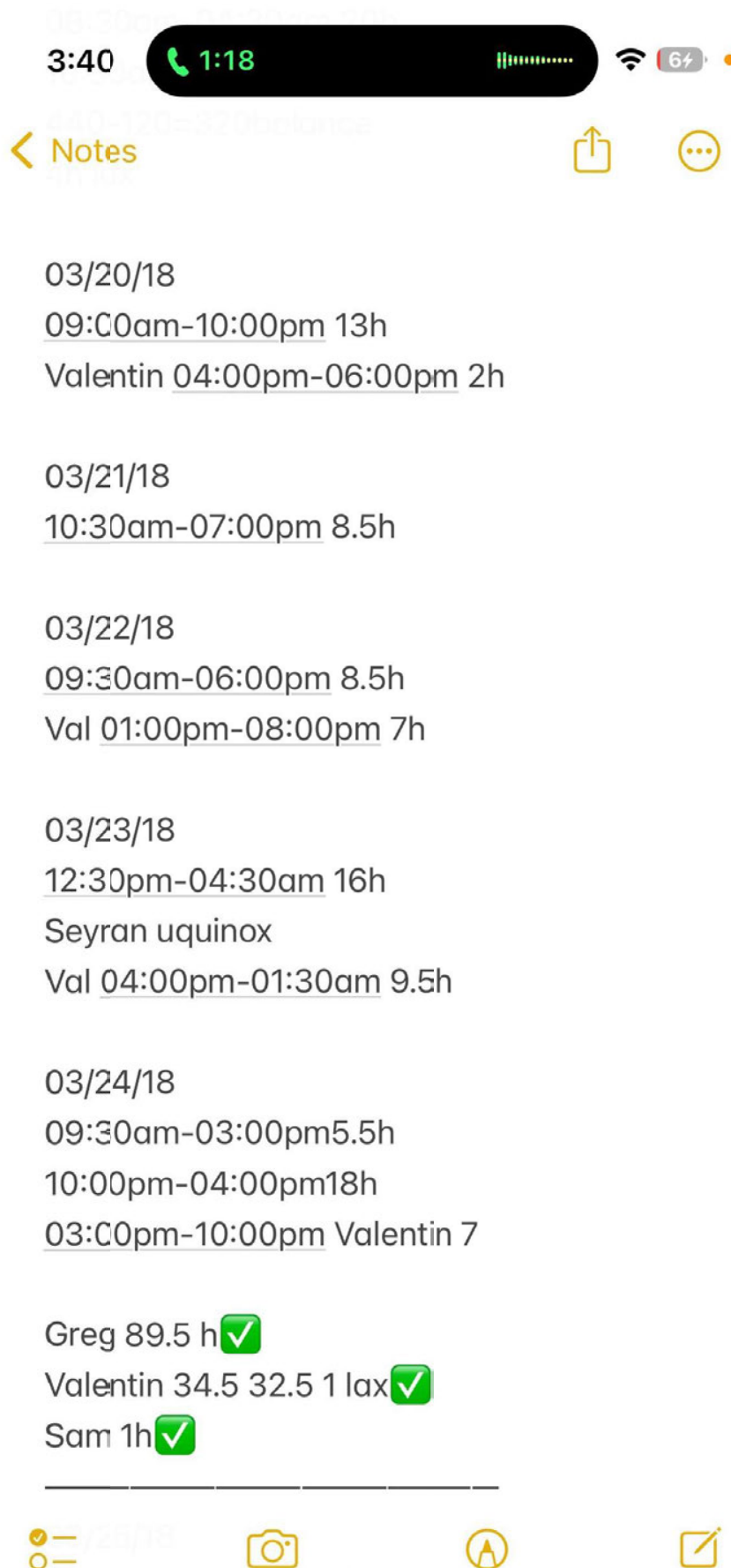
8 I declare under penalty of perjury under the laws of the State of California that the
9 foregoing is true and correct.

10 Executed on this 24th day of April, 2025, at Los Angeles, California.

11
12 

Grigor Vahanyan (Apr 24, 2025 14:03 PDT)

Grigor Vahanyan



Decl of Vahanyan

Final Audit Report

2025-04-24

Created:	2025-04-24
By:	Andrew Jablon (ajablon@rpblaw.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAA_yV-TKxMNfGSepYg_bqWqtm32g45GHkq

"Decl of Vahanyan" History

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2025-04-24 - 8:58:30 PM GMT
-  Email viewed by redlimoline@[REDACTED]
2025-04-24 - 9:03:07 PM GMT
-  Signer redlimoline@gmail.com entered name at signing as Grigor Vahanyan
2025-04-24 - 9:03:38 PM GMT
-  Document e-signed by Grigor Vahanyan (redlimoline@[REDACTED])
Signature Date: 2025-04-24 - 9:03:40 PM GMT - Time Source: server
-  Agreement completed.
2025-04-24 - 9:03:40 PM GMT

Exhibit “D”

DECLARATION OF AJAY SANGHA

I, Ajay Sangha, declare as follows:

1. I am over the age of 18, and have personal knowledge of the matters set forth herein. If called upon and sworn as a witness, I could and would competently testify to the matters set forth herein.

2. I am a friend and business associate of Odell Beckham, Jr. In 2018 I was, among other things, his personal assistant. In my capacity as Mr. Beckham's personal assistant, I lived with him at a house on Solar Drive in Los Angeles during the summer of 2018.

3. While staying in Los Angeles, if Mr. Beckham and I were to go out, he would hire a car service - Red Limo Line, LLC ("Red Limo") - to drive us. Grigor Vahanyan, who I understand to be the owner of the car service, would drive us, and if we were going out with multiple people and needed additional cars, Red Limo would provide an additional driver.

4. On March 22, 2018, Mr. Vahanyan drove me and Mr. Beckham to various locations in the Los Angeles area, including the VELO Sports Center in Carson, CA where Mr. Beckham had a training session. We returned home to Solar Drive at approximately 6:00 p.m.

5. Mr. Beckham decided that he wanted to stay in that evening, and invited Jeremy Hill to hang out with us to play video games.

6. Attached as Exhibit "A" is a screen capture from a video taken that evening by Mr. Beckham, Jr. In the video you can see me and Mr. Hill. The video was taken at 10:02 p.m., and Mr. Hill stayed for several hours before leaving that night.

7. Mr. Beckham and I remained at Solar Drive until approximately 2:30 p.m. the following day, March 23, 2018, when Mr. Vahanyan picked us up to go to another training session.

8. On the evening of March 23, 2018, Mr. Beckham and I went out to eat


1 and to various bars in the Los Angeles area. We returned home to Solar Drive at
2 approximately 4:30 a.m.

3 9. The following morning, we left the home on Solar Drive at 9:30 a.m. to
4 go to Santa Monica Beach where Mr. Beckham worked out with his personal trainer,
5 Jamal Liggin.

6 10. Attached hereto as Exhibit "B" is a true and correct copy of a photograph
7 I took of Mr. Beckham's dogs at the Santa Monica beach while I was waiting for him
8 to complete his work out. Also attached as part of Exhibit B is a screenshot of the
9 Metadata of the photograph.

10 I declare under penalty of perjury under the laws of the United States of
11 America that the foregoing is true and correct.

12 Executed on this 24th day of April, 2025, at Los Angeles, California.

13
14 
Ajay Sangha (Apr 24, 2025 14:16 PDT)

Ajay Sangha



IMG_1192.mov

QuickTime movie - 24.7 MB

Information

[Show Le](#)

Created March 22, 2018 at 10:02 P

Modified Today, 4:56 P

Last opened Today, 4:58 P

Dimensions 720x128

Codecs Timed Metadata, H.264
MPEG-4 A/V

Color profile HD (1-1-

Duration 00:00

Audio channels Mono

Encoding software 11.2

Tags

Add Tags...



Rotate Left



Trim



More

EXHIBIT A
EXHIBIT 3

Page 3
Page 134



Page 4

EXHIBIT B

EXHIBIT 3

Page 135



Decl of Ajay

Final Audit Report

2025-04-24

Created:	2025-04-24
By:	Andrew Jablon (ajablon@rpblaw.com)
Status:	Signed
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"Decl of Ajay" History

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2025-04-24 - 9:15:26 PM GMT
-  Signer ajay@[REDACTED].com entered name at signing as Ajay Sangha
2025-04-24 - 9:16:01 PM GMT
-  Document e-signed by Ajay Sangha (ajay@[REDACTED].com)
Signature Date: 2025-04-24 - 9:16:03 PM GMT - Time Source: server
-  Agreement completed.
2025-04-24 - 9:16:03 PM GMT



Adobe Acrobat Sign

Exhibit “E”

DECLARATION OF ODELL BECKHAM, JR.

I, Odell Beckham, Jr., declare as follows:

1. I am over the age of 18, and have personal knowledge of the matters set forth herein. If called upon and sworn as a witness, I could and would competently testify to the matters set forth herein.

2. During the summer of 2018, I resided at a home on Solar Drive in Los Angeles, California. My friend and business associate, Ajay Sangha lived at Solar Drive with me that summer.

3. While staying in Los Angeles, if I was going to go out, I would hire a car service – Red Limo Line, LLC (“Red Limo”) – to drive me and my friends. Grigor Vahanyan, who I understand to be the owner of the car service, would drive me, and if we were going out with multiple people and needed additional cars, Red Limo would provide an additional driver.

4. On March 22, 2018, Mr. Vahanyan drove me and Mr. Sangha to various locations in the Los Angeles area, including a trip to the VELO Sports Center in Carson, CA where I had a training session. Attached as Exhibit “A” is a screen capture of a video taken of me working out at 2:47 p.m. on March 22, 2018 at the VELO Sports Center.

5. We returned home to Solar Drive at approximately 6:00 p.m.

6. I decided that I wanted to stay in that evening, and invited Jeremy Hill to hang out with Mr. Sangha and me and play video games.

7. I had a text exchange with Cliff King, a representative from Nike, at about 7:30 p.m. that evening. Mr. King asked what I was planning on doing that night. I responded to him that I was laying low and getting some rest. I told him that the workouts had been kicking my butt. A copy of that text exchange is attached hereto as Exhibit “B”.

8. Additionally, attached hereto as Exhibit “C” is a video which I recorded of Messrs. Hill and Sangha playing video games with me at my home on Solar Drive.

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1 I can be heard talking in the background.

2 9. Attached hereto as Exhibit "D" is: (a) a screen capture image from that
3 video; and (b) the metadata of that video showing the date and time it was recorded
4 (March 22, 2018, 10:02 p.m.). Mr. Hill did not leave until several hours after that.

5 10. I met with Mr. Cliff King from Nike at my Solar Drive home around 1
6 pm on March 23, 2018.

7 11. I did not leave the Solar Drive home until March 23, 2018, when Mr.
8 Vahanyan picked up me and Mr. Sangha at approximately 2:30 p.m.

9 12. On the evening of March 23, 2018, Mr. Sangha and I went out to eat and
10 to various bars in the Los Angeles area. We returned home to Solar Drive at
11 approximately 4:30 a.m.

12 13. The following morning, we left the home on Solar Drive at
13 approximately 9:30 a.m. Mr. Vahanyan drove me, Mr. Sangha, and my dogs to Santa
14 Monica beach, where I worked out with my personal trainer, Jamal Liggin.

15 14. Later that day, at approximately 2:00 p.m., Mr. Vahanyan brought me to
16 the Nickelodeon Kids Choice Awards at the Forum in Inglewood, California.
17 Attached as Exhibit "E" are photographs of me at the event.

18 15. At no time have I ever met Ashley Parham, the Plaintiff in *Ashley*
19 *Parham, et al. v. Sean Combs, et al.*, USDC Case No. 3:24-cv-07191-RFL. Further,
20 at no time have I been to Loma Vista Drive in Orinda, California. In fact, to the best
21 of my recollection, I have never been in Orinda, California.

22 I declare under penalty of perjury under the laws of the United States of
23 America that the foregoing is true and correct.

24 Executed on this 24th day of April, 2025, at Miami,
25 Florida.

26 

27 _____
28 Odell Beckham, Jr.

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EXHIBIT A
EXHIBIT 3

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Chat with "Cliff King Nike" <+16787774713> on March 22, 2018

Cliff King Nike <+16787774713>

Myself <+15044397612>

Earliest item: 2018-03-22 19:01:24

Latest item: 2018-03-22 19:45:51

Thursday 22 March 2018

Instant Message : Native Messages

19:01:24

From

Cliff King Nike <+16787774713>

Where are we meeting tomorrow at 1pm?

Instant Message : Native Messages

19:29:47

From

Myself <+15044397612>

130 is good at my house

Instant Message : Native Messages

19:35:56

From

Cliff King Nike <+16787774713>

Bet.

Instant Message : Native Messages

19:36:02

From

Cliff King Nike <+16787774713>

What you doing tonight?

Instant Message : Native Messages

19:36:22

From

Myself <+15044397612>

Laying low get some rest prollly link up tomorrow night

Instant Message : Native Messages

19:44:47

From

Cliff King Nike <+16787774713>

Aight bet.

Instant Message : Native Messages

19:45:13

From

Cliff King Nike <+16787774713>

Nothing wrong with laying low.....

Instant Message : Native Messages

19:45:23

From

Myself <+15044397612>

Workouts been beating my ass

Instant Message : Native Messages

19:45:51

Docusign Envelope ID: BC92DDBD-20E4-4C5F-8F58-7115ADAAD749

Chat with "Cliff King Nike" <+16787774713> on March 23, 2018

Cliff King Nike <+16787774713>

Myself <+15044397612>

Earliest item: 2018-03-23 12:53:36

Latest item: 2018-03-23 12:53:36

Friday 23 March 2018

Instant Message : Native Messages

12:53:36

From

Cliff King Nike <+16787774713>

I'll be there a little ahead of the rest of the crew.

End Thread

Thread Statistics

Instant Message Count

1

Docusign Envelope ID: BC92DDBD-20E4-4C5F-8F58-7115ADAAD749

Chat with "Cliff King NIKE" <+16787774713> on March 23, 2018

h.vannorman@icloud.com
Cliff King NIKE <+16787774713>
Moms <+15044524052>

Earliest item: 2018-03-23 15:57:26

Latest item: 2018-03-23 16:07:40

Friday 23 March 2018

Instant Message : Native Messages
15:57:26

From

Moms <+15044524052>

Call me. I didn't know you were coming to LA to see O

He has training at 3pm

Instant Message : Native Messages
16:07:40

From

Cliff King NIKE <+16787774713>

Will do. My bad, I was trying to call you earlier this morning.

We will make sure he's outta here by 2:30.

End Thread

Thread Statistics

2

Instant Message Count

EXHIBIT C

(Provided in Native Form)

Docusign Envelope ID: BC92DDBD-20E4-4C5F-8F58-7115ADAAD749



IMG_1192.mov

QuickTime movie - 24.7 MB

Information

[Show Le](#)

Created March 22, 2018 at 10:02 P

Modified Today, 4:56 P

Last opened Today, 4:58 P

Dimensions 720x128

Codecs Timed Metadata, H.26
MPEG-4 A

Color profile HD (1-1-

Duration 00:0

Audio channels Mo

Encoding software 11.2

Tags

Add Tags...



Rotate Left



Trim



More

EXHIBIT D
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EXHIBIT E

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EXHIBIT E
EXHIBIT 3

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Exhibit “F”

DECLARATION OF JEREMY HILL

I, Jeremy Hill, declare as follows:

1. I am over the age of 18, and have personal knowledge of the matters set forth herein. If called upon and sworn as a witness, I could and would competently testify to the matters set forth herein.

2. On the evening of March 22, 2018, Odell Beckham, Jr. invited me to his home on Solar Drive in Los Angeles, California.

3. Mr. Beckham, along with Ajay Sangha, and I hung out that evening and, among other things, played videogames. Attached as Exhibit "A" is a screen capture from a video taken that evening by Mr. Beckham, Jr. In the video you can see me and Mr. Sangha. The video was taken at 10:02 p.m., and I stayed for several hours after that before leaving for the night.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 30th day of April, 2025, at Baton Rouge,
Louisiana.

Jeremy hill

Jeremy Hill



IMG_1192.mov

QuickTime movie - 24.7 MB

Information

[Show Le](#)

Created March 22, 2018 at 10:02 P

Modified Today, 4:56 P

Last opened Today, 4:58 P

Dimensions 720x128

Codecs Timed Metadata, H.264
MPEG-4 A/V

Color profile HD (1-1-

Duration 00:00

Audio channels Mono

Encoding software 11.2

Tags

Add Tags...



Rotate Left



Trim



More

Signature: 
Jeremy Hill (Apr 30, 2025 18:45 CDT)
Email: jeremyhill27@

Decl of Hill


Final Audit Report


2025-04-30


Created:	2025-04-29
By:	Dominique Davillier (dominique@davillierlawgroup.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAA7UQAsIS0dGkwUXzrL8RQNRmNiOFER3p0


"Decl of Hill" History

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 Agreement completed.
2025-04-30 - 11:45:11 PM GMT



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